

H, P, X50, Y0:

BEFORE THE
COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

IN THE MATTER OF:
INVESTIGATION CONCERNING THE
PROPRIETY OF PROVISION OF
INTERLATA SERVICES BY BELL SOUTH
TELECOMMUNICATIONS, INC., PURSUANT
TO THE TELECOMMUNICATIONS ACT OF

CASE NO. 96-608

TRANSCRIPT OF EVIDENCE
VOLUME II

DATE OF HEARING: August 26, 1997

1

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1 MR. McTYEIRE:

2 Just for clarification, are parties going to be allowed
3 to ask questions at the conclusion if we have something
4 we need to do here prior to adjourning back to the
5 hearing room, or would it be more appropriate to ask
6 questions during the presentation?

7 CHAIRWOMAN BREATHITT:

8 Well, since I don't know much about this, maybe you
9 could direct that question to counsel, if it's a
10 question that needs to be asked for the application
11 here, if that's what you want to know.

12 MR. McTYEIRE:

13 I think it's your all's intent that she gets to proceed
14 uninterrupted. Is that . . .

15 MR. ELLENBERG:

16 As you would with any summary of testimony, I think
17 that's appropriate, and I think it will keep things as
18 orderly as possible. If there are a few questions that
19 perhaps need to be asked here, when she's concluded the
20 presentation, I think it might be appropriate for a few
21 questions, but, just to make sure we stay in the order
22 of appearances, and so forth, it would be better to go
23 back to the Commission.

24 CHAIRWOMAN BREATHITT:

25 I think clarifying questions, while you have the

1 CHAIRWOMAN BREATHITT:

2 Good morning, everyone. We are here for the second day
3 of our hearing, and, at this time, I would like to
4 swear the witness in and begin this morning's
5 proceeding.

6 WITNESS SWORN

7 MR. ELLENBERG:

8 Thank you, Chairman and Commissioners. For the record,
9 I'm William Ellenberg. I'll be doing the direct
10 examination of Ms. Calhoun. I'm sure you noticed this
11 morning we've provided a copy of a glossary of acronyms
12 that will be referred to or have been referred to.
13 Hopefully, that will be a little help to you.

14 VICE CHAIRMAN HOLMES:

15 Thank you.

16 MR. ELLENBERG:

17 I have additional copies for the parties if they're
18 interested in having one as well. For the sake of
19 clarification, to make sure we're all on the same page
20 and we can go as orderly as possible this morning, we
21 intend to conduct the direct examination of Ms. Calhoun
22 here this morning. She will do the demonstration in
23 context of her summary, and then we'll adjourn and
24 return to the Commission's building for cross
25 examination. That's our understanding of how we'll go.

1 application up, if we can make sure you don't cross
2 that line into something that really could be asked
3 back at the Commission where I think the setting is
4 probably better for all of us.

5 MR. ELLENBERG:

6 I think our intent is to limit that as much as
7 possible, but, clearly, I think some of the AT&T folks
8 have seen this before, but there may be a need to ask
9 something here, so I guess we will proceed with the
10 intent to do any clarification regarding the
11 presentation at the end. Thank you.

12 CHAIRWOMAN BREATHITT:

13 Okay.

14 The witness, GLORIA CALHOUN, after having been
15 first duly sworn, testified as follows:

16 DIRECT EXAMINATION

17 BY MR. ELLINGTON:

18 Q. Ms. Calhoun, would you state your full name for the
19 record, please?

20 A. Gloria Calhoun.

21 Q. And by whom are you employed?

22 A. By BellSouth Telecommunications, Inc.

23 Q. What's your business address?

24 A. 675 West Peachtree Street, N.E., in Atlanta.

25 Q. And what is your position with BellSouth

1 describes a common gateway interface or a CGI approach
 2 that would let a CLEC take the underlying data from
 3 LENS and manipulate it, programmatically or
 4 electronically, and put it into the CLEC's operations
 5 support systems.
 6 Q. And is that - may I refer to that as the CGI
 7 specification?
 8 A. Yes.
 9 Q. Is the CGI specification a published document today?
 10 A. Perhaps I better be careful when you say "published."
 11 It is one that has been made available to CLECs.
 12 Q. Is it current as of today?
 13 A. No, it's not. BellSouth discontinued working on it in
 14 April of this year when we received indication from
 15 AT&T that they were no longer interested in pursuing
 16 it, so we haven't made an effort to keep it updated.
 17 We have said, however, that, should AT&T or any other
 18 CLEC indicate that they did, in fact, want to use it,
 19 we would bring it current.
 20 Q. So, as of today, the CGI specification does not reflect
 21 the LENS system that's being offered to CLECs; is that
 22 a true statement?
 23 A. Yes.
 24 Q. And there would be further effort required on
 25 BellSouth's part to create a CGI specification that was

1 consistent with the system; is that also correct?
 2 A. I would say there would be further effort on
 3 BellSouth's part to update the CGI specification to
 4 make it reflect what is currently available in LENS,
 5 and I also would add to that that, through the LENS
 6 system itself, the hypertext markup language, HTML,
 7 that is the underlying system level description of the
 8 data, is available for viewing through LENS already, so
 9 that, to the extent that there's a field that's not
 10 already contained in the CGI specification, it can be
 11 viewed directly through LENS. So the bottom line of
 12 that is that there's enough information currently
 13 available to allow a CLEC to begin to undertake that
 14 integration effort, and BellSouth is committed to
 15 working with anyone who indicates that they, in fact,
 16 want to do that, but, currently, there's nobody asking
 17 for that.
 18 Q. Ms. Calhoun, you provided a copy of the LENS User
 19 Guide, I believe, as Exhibit 28 to your direct
 20 testimony. Do you have that available?
 21 A. I don't have it here at the desk. There is one here.
 22 Q. I don't know that you need to have it. Why don't I try
 23 to ask my questions. If you do need it, though, please
 24 just let me know and we'll get it for you.
 25 A. All right.

1 Q. The version that I have, Ms. Calhoun, is dated June 17,
 2 1997. Is that the most current version of the User
 3 Guide?
 4 A. Yes.
 5 Q. Does it reflect the LENS system as it's being used
 6 today?
 7 A. It reflects the use of the LENS system primarily as it
 8 has been used today. There have been some changes to
 9 LENS since that time that might not necessarily be
 10 reflected. For example, the list of products and
 11 services that you saw earlier today previously was
 12 presented in a random order, based on how it came out
 13 of the database, and it's changed to alphabetical
 14 order, so I don't know that the LENS User Guide has
 15 been updated to reflect that type of change.
 16 Q. So there have been changes since June 17th that would
 17 not be in the LENS User Guide; is that correct?
 18 A. Yes.
 19 Q. Can you describe for me the advance notice of changes
 20 to LENS that BellSouth is providing to CLECs?
 21 A. I don't know. I mean, I can't describe a specific
 22 interval for advance notice information. Our updates
 23 to the LENS User Guide are distributed to CLECs through
 24 their Account Teams or through the CLEC conferences and
 25 also the LENS User Guide itself is available on

1 BellSouth's web site on the Internet.
 2 Q. And is the User Guide that is available on the Internet
 3 an up-to-date version of the User Guide?
 4 A. It's the June 17th version.
 5 Q. So it would . . .
 6 A. It's the current version.
 7 Q. So it also does not include whatever effect of changes,
 8 since June 17th, that have been made to LENS?
 9 A. That's right. Every time we make a change - for
 10 example, if we change something that is fairly self-
 11 evident, we're not necessarily going to reissue the
 12 LENS User Guide at that point.
 13 Q. And would it be fair to say, Ms. Calhoun, that there is
 14 no standard method of providing advance notice to CLECs
 15 of changes to LENS today?
 16 A. There's a standard method of providing changes to CLECs
 17 to LENS today. I think it's fair to say that there's
 18 not a standard interval for advance notice.
 19 Q. If it's important to your answer, I want to make sure
 20 that I distinguish between providing the changes to
 21 LENS and providing advance notice of the changes to
 22 LENS, and my question is really directed towards
 23 advance notice to CLECs of changes to LENS, and I
 24 understood your answer to be that there is not a
 25 uniform way to provide advance notice to CLECs; is that

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STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
MONTGOMERY, ALABAMA

IN RE: BELLSOUTH TELECOMMUNICATIONS,
INC.,

DOCKET NO. 25835 VOL. II

PROCEEDINGS taken before the Alabama
Public Service Commission in the
above-referenced matter on August 19,
1997, (morning session) commencing at
9:05 a.m. in the hearing room of the
Alabama Public Service Commission, RSA
Union Building, 100 North Union Street,
Room 904, Montgomery, Alabama, before Sha
Hurst, Certified Shorthand Reporter and
Notary Public in and for the State of
Alabama at Large.

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1 you can move information back and forth.
2 It's not that complicated an
3 undertaking. And finally, that's
4 something that BellSouth service reps do
5 all the time. We're working and pulling
6 information back and forth from different
7 places.

8 Q. That last process you described is
9 generally referred to as cutting and
10 pasting; is that correct?

11 A. Yes.

12 Q. We'll talk about that in a second.

13 Back to CGI, regardless of
14 whether or not BellSouth should or should
15 not have done it, if a CLEC wants to have
16 the pre-ordering and ordering system
17 communicate information directly with
18 each other, the CLECs will have to
19 develop software on their own to be able
20 to do that?

21 A. Yes.

22 Q. And in order to do that the CLECs will
23 need to have the CGI specification for

1 LENS; is that correct?

2 A. Yes, that's correct.

3 Q. Now, on Page 24 of your rebuttal
4 testimony specifically about the first
5 ten lines or so, you discussed the CGI
6 specification for LENS. And my question
7 is, when did BellSouth complete
8 development of the CGI specification?

9 A. I don't know that I can say that
10 BellSouth completed development of that.
11 BellSouth had it in progress and
12 discontinued work on it in progress
13 because no CLEC was expressing an
14 interest in it. We had had a number of
15 discussions with AT&T about it, and we
16 had kind of stops and starts. And at the
17 point that AT&T told us that they weren't
18 interested in pursuing us, we stopped
19 spending time and money on it. We have a
20 draft version that's available that could
21 be updated and made available, but in the
22 absence of anyone asking for it, that
23 doesn't seem like a prudent use of our

1 resources.

2 Q. Mrs. Calhoun, would you turn to page 24
3 of your rebuttal testimony. At line 23
4 and 24 you say this, AT&T began
5 requesting specifications in 1996; is
6 that correct?

7 A. Yes.

8 Q. Is it your position that AT&T told
9 BellSouth at some point that it no longer
10 wanted a copy of that specification?

11 A. Yes.

12 Q. When was that?

13 A. I believe it was April of this year.

14 Q. Mrs. Calhoun, have you heard Mr. Bradbury
15 testify in regulatory proceedings on this
16 issue that AT&T still wants a copy of
17 that CGI specification?

18 A. I don't recall his specific testimony on
19 that. And let me make sure that we're
20 communicating about this. AT&T, there's
21 a difference between AT&T wanting a copy
22 of the specification, and AT&T telling us
23 that they are actually interested in

1 going forward with this. And what I'm
2 saying is we were told in April of this
3 year by AT&T that they weren't interested
4 in pursuing this.

5 Q. Who told BellSouth that?

6 A. I'll have to double-check.

7 Q. Do you recall a particular date? Just a
8 little more specific than just April?

9 A. Hold on just one second. It would have
10 been on or about April 8th.

11 Q. But as of today there is no completed CGI
12 specification that CLECs could use to
13 develop a software to pull out
14 pre-ordering and ordering interfaces to
15 communicate information directly with
16 each other?

17 A. No. I believe we could update the one we
18 have within 30 days or less.

19 Q. The answer is today it's not complete,
20 but it could be complete in 30 days?

21 A. Yes.

22 Q. Let's go back to cutting and pasting very
23 briefly. Just as an example that would

1 BEFORE THE
2 FLORIDA PUBLIC SERVICE COMMISSION

3 In re: Consideration of :DOCKET NO. 960786-TL
4 BellSouth Telecommunications, :
5 Inc.'s entry into interLATA :
6 services pursuant to Section 271 :
7 of the Federal Telecommunications :
8 Act of 1996. :
9 _____:

10 THIRD DAY - AFTERNOON SESSION

11 VOLUME XII

12 PAGE 1304 through 1379

13 PROCEEDINGS: HEARING

14 BEFORE: CHAIRMAN JULIA L. JOHNSON
15 COMMISSIONER J. TERRY DEASON
16 COMMISSIONER SUSAN F. CLARK
17 COMMISSIONER DIANE K. KIESLING
18 COMMISSIONER JOE GARCIA

19 DATE: Thursday, September 4, 1997

20 TIME: Commenced at 12:00 p.m.

21 PLACE: Betty Easley Conference Center
22 Room 148
23 4075 Esplanade Way
24 Tallahassee, Florida

25 REPORTED BY: NANCY S. METZKE, RPR, CCR

26 APPEARANCES:

27 (As heretofore noted.)

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1 Q Did BellSouth at one point commence the
2 development of a CGI system for use with LENS?

3 A BellSouth began the development of a CGI
4 technical specification, but that's something different
5 than building a system. The actual CGI program would be
6 done on the -- or I guess I should say a portion of the
7 programming would be done on the CLEC side of the interface
8 as well.

9 Q Would a portion of the programming be done on
10 BellSouth's side of the interface?

11 A Yes.

12 Q BellSouth -- Let me try and understand.
13 BellSouth began the development of a technical
14 specification for a CGI interface but at some point
15 abandoned that effort; is that correct?

16 A Yes, the effort was abandoned when it appeared
17 that there was not going to be a party pursuing that option
18 with us.

19 Q Now I believe you have testified that a user of
20 LENS might choose to integrate some of the pre-ordering
21 information from LENS with its own EDI system to avoid its
22 customer representative having to move from one system to
23 another; is that correct?

24 A Yes.

25 Q Would that be a CGI application?

1 PLACE: Dobbs Building, Raleigh, North Carolina

2 DATE: Friday, September 26, 1997

3 TIME IN SESSION: 9:00 A.M. TO 4:55 P.M.

4 BEFORE: Commissioner Jo Anne Sanford, Presiding
5 Commissioner J. Richard Conder
6 Commissioner Allyson K. Duncan
7 Commissioner Judy Hunt
8 Commissioner Ralph A. Hunt
9 Commissioner Robert V. Owens, Jr.
10 Commissioner William R. Pittman

11 IN THE MATTER OF:

12 DOCKET NO.: P-55, SUB 1022
13 BellSouth Telecommunications, Inc.
14 BellSouth's In-Region InterLATA Service Pursuant
15 to Section 271 of the Telecommunications Act of 1996

16 Volume 8

17 A P P E A R A N C E S:

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1 A. No, that -- that's not correct.

2 Q. What has BellSouth published in the nature of
3 specifications for LENS?

4 A. BellSouth provided technical specifications at the
5 request of the Georgia Public Service Commission, in
6 August of 1996, and that consisted of technical
7 information about LENS. And BellSouth also provided
8 what's known as a common gateway interface specification
9 that provided information that would enable a CLP to
10 develop programs to use the data from LENS if they
11 wanted to customize that or intergrate with their own
12 interfaces.

13 Q. In the technical specs that were provided to the
14 Georgia Commission in August of 1996, are those still
15 current?

16 A. Yes.

17 Q. They represent the LENS system as it exists today?

18 A. Well, they represent the technical information
19 that a CLP needs to use in order to gather the
20 information -- the technical information a CLP needs to
21 know in order to use the LENS system.

22 Q. In order to use the LENS system?

23 A. Yes.

24 Q. Would that technical information provided to the

1 Georgia Commission in August '96, would that information
2 be sufficient to permit a CLP to integrate its own
3 systems with LENS and carry over data on a machine to
4 machine basis?

5 A. No, that's the purpose of the common gateway
6 interface, also known as the CGI specification.

7 Q. Okay. Now, is the CGI Specification currently
8 up-to-date?

9 A. No, it's not.

10 BellSouth had begun that effort at the request
11 of AT&T, and earlier this year, AT&T advised us that
12 because we were developing the customized interface at
13 their request that they didn't plan to proceed the CGI
14 method as well, and there was no one else interested --
15 interested in it so we discontinued work on it.

16 Q. And so there is no CGI specification today that
17 represents LENS as it exists today, is that true?

18 A. It's true in that the CGI specification that
19 exists today doesn't represent LENS in its totality.
20 It's -- a very large portion of the work has been done
21 and there's considerable information there. It would
22 require some update if there was someone who was
23 interested in using it, which is as far as we can tell
24 today, there is not.

ATTACHMENT 13



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

3 In Re: Consideration of)
4 BellSouth Telecommunications) DOCKET NO. 960786-TL
5 Inc.'s entry into interLATA services)
6 pursuant to Section 271 of the Federal)
7 Telecommunications Act of 1996.)

8 DEPOSITION OF: WILLIAM N. STACY
9 TAKEN AT THE
10 INSTANCE OF: THE STAFF OF THE FLORIDA
11 PUBLIC SERVICE COMMISSION

12 PLACE: GERALD L. GUNTER BUILDING
13 ROOM 262
14 2540 SHUMARD OAK BOULEVARD
15 TALLAHASSEE, FLORIDA

16 TIME: COMMENCED AT 11:00 A.M.
17 CONCLUDED AT 6:45 P.M.

18 DATE AUGUST 14, 1997

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WILLIAM N. STACY

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1 operating support system.

2 Q Exactly what do you mean by their effort?

3 A Let me use a specific example I've used earlier,
4 the EDI ordering form is the national standard for
5 ordering, and that has been established. There has been no
6 national standard for pre-ordering established, and
7 BellSouth developed LENS as its desire to make the
8 pre-ordering data available to the carriers in
9 substantially the same time and manner as it's available to
10 our own service reps.

11 How the carriers use that pre-ordering data and
12 combine that with the ordering process through EDI is then
13 a business decision they have to make, whether they wait on
14 the evolving national standard that we believe is going to
15 happen for pre-ordering, whether they accept AT&T's version
16 called EC-Lite and integrate that with their systems or
17 whether they do something else. We believe our commitment
18 was to make the data available, to provide access to the
19 pre-ordering operating support systems in substantially the
20 same time and manner and not to do the integration for
21 them.

22 We did, for the small carriers, produce the
23 integrated solution called LENS that includes both ordering
24 and pre-ordering believing that some of the small carriers
25 would not want to adapt to their systems or commit to that

1 work effort on their own. So we have made a series of
2 tools available that range from very simple to very complex
3 that the carriers have access to the OSSs through, and
4 they've got to pick how that fits into their business model
5 and implement that as their own choice.

6 Q I would like to refer you now to page 28 in your
7 direct testimony, looking in lines 2 through 7. You state
8 there that BellSouth has collected data that would compare
9 its performance to ALECs with BellSouth's performance to
10 its own retail customers. Could you explain, why didn't
11 BellSouth include a comparison of CLECs in Florida to
12 BellSouth in Florida in exhibit WNS-F?

13 A No, I can't explain why we didn't do that. I
14 don't remember when we were preparing that exhibit why
15 Florida was not brought into that comparison.

16 Q Does BellSouth have this information?

17 A The data is available. It will have to be
18 reassembled in this format, but it is available.

19 Q We would like that as another late-filed
20 exhibit. I noticed that --

21 MS. WHITE: Wait a minute. Let me just make sure
22 I have the right stuff. So you want to add to WNS-F
23 information for BellSouth in Florida?

24 MS. CULPEPPER: Correct.

25 BY MS. CULPEPPER:

1 Q Not necessarily.

2 A Okay, I'm not clear.

3 Q Well, let's limit it to OSS. That may be easier.

4 A Okay. For instance, in my direct testimony I
5 described that we were preparing a measurement for the
6 response time from the navigator contract to the
7 pre-ordering systems to how long does it take from the time
8 you actually request the data until that data is returned
9 to you. That is a category of an OSS measurement. There
10 is an existing measurement in place for BellSouth today
11 from that point. I am putting a similar measurement in
12 place for LENS users from that point for the existing
13 pre-ordering system and for EC-Lite users from that same
14 point so that in the future we will be able to directly
15 compare that data.

16 Q What other functions are now measured in addition
17 to the one you mentioned?

18 A The other functions that are now measured are
19 system capacity limit functions. We look at the capacity
20 of each of the systems on a regular basis and determine
21 whether additions to those systems are required.

22 Q Okay. Moving now to the systems that have been
23 and are being developed for competitive purposes. How
24 often do you make changes to the LENS system?

25 A We make changes to the LENS system regularly.

1 Normally, weekly. We will be moving that over time to an
2 eight-week window of systematic changes, but we are not
3 there yet in terms of software development.

4 Q Do you have an anticipated date where you would
5 be changing that?

6 A When we change the process? It's an internal
7 target. It's not a date, but from the software development
8 cycle, it appears to me that we will have satisfied enough
9 of the CLECs' needs and requests for changes that if our
10 current experience is true that somewhere between now and
11 the end of the year we'll be able to move to a more normal
12 development cycle, which is about eight weeks. But as I
13 have stated earlier, the changes that occurred are driven
14 by customer demands; and if a new set of demands comes in
15 at some point in time, we may have to accelerate that.

16 Q So this is in its development and learning
17 process and it hasn't yet firmed up to the point where
18 people have stopped asking for changes?

19 A And probably never will. BellSouth's existing
20 retail systems that provide similar functions have been in
21 place, in the case of RNS, one we talked about earlier, has
22 been in place for five years. They still do changes every
23 four weeks. It depends on the users of the system and
24 their desires and needs.

25 Q So if I understand it correctly, right now

ATTACHMENT 14



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May 14, 1997

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VIA HAND DELIVERY

Ms. Terri M. Lyndall, Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334

EXECUTIVE SECRETARY
G.P.S.C.

Re: DOCKET NO. 6352-U Petition of AT&T for the Commission to Establish
Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services

Dear Ms. Lyndall:

Enclosed for filing in the above-referenced matter are the original and
twenty-seven (27) copies of AT&T's Response to BellSouth's April 15,
1997 Monthly Surveillance Report for Electronic Interfaces in the above-
referenced docket.

Please stamp the copies, returning two to me. Copies have been served
upon all parties of record as shown on the attached certificate of service.
Thank you for your assistance in this matter.

Sincerely,

James P. Lamoureux

Enclosures

cc: Hon. Stan Wise, Chairman
Hon. Dave Baker
Hon. Robert B. Baker
Hon. Mac Barber
Hon. Bob Durden
Nancy G. Gibson, Esq.
All Parties of Record